

WA Independent Market Operator

Assessment of System Management's internal procedures and business processes with the Market Rules, and the System Management's compliance with the Market Rules and Market Procedures

25 September 2007

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EXECUTIVE SUMMARY

This report sets out the results of the market audit by PA Consulting Group in carrying out its assessment of the compliance of System Management's internal procedures and business processes with the Market Rules, and System Management's compliance with the Market Rules and Market Procedures.

This market audit has been carried out under Market Rule 2.14.6 (b) which requires that

... the IMO must at least annually, and may more frequently where it reasonably considers that System Management may not be complying with the Market Rules and Market Procedures:

(a) require System Management to demonstrate compliance with the Market Rules and Market Procedures by providing such records as are required to be kept under these Market Rules or any Market Procedure or

(b) subject System Management to an audit by the Market Auditor to verify compliance with the Market Rules and Market Procedures.

PA has found that, although System Management has generally complied with its obligations under the Market Rules during the first year of the operation of the electricity market, a number of instances of non-compliance, which we believe to be not material, have been noted together with one instance of non-compliance which we believe to be material, although this is now being rectified.

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1. INTRODUCTION

The document sets out the results of the market audit by PA Consulting Group in carrying out its assessment of the compliance of System Management's Internal Procedures and business processes with the Market Rules, and System Management's compliance with the Market Rules and Market Procedures.

1.1 SCOPE OF THE MARKET AUDIT

This market audit has been carried out under Market Rule 2.14.6 (b) which requires that

... the IMO must at least annually, and may more frequently where it reasonably considers that System Management may not be complying with the Market Rules and Market Procedures:

(a) Require System Management to demonstrate compliance with the Market Rules and Market Procedures by providing such records as are required to be kept under these Market Rules or any Market Procedure; or

(b) Subject System Management to an audit by the Market Auditor to verify compliance with the Market Rules and Market Procedures.

1.2 MARKET AUDIT PROCESS

In conducting the market audit on the compliance of System Management with the Market Rules, PA has:

- Ensured that it is up to date with its understanding of the West Australia Electricity Market Rules
- Identified all obligations placed on System Management by the Market Rules
- Mapped those obligations to the applicable Market Procedures and Internal Procedures
- Reviewed the System Management procedures in place for compliance with the Market Rules
- Sought evidence that System Management is following those procedures so as to comply with the Market Rules
- Had discussions with System Management managers and staff to clarify issues identified and then
- Prepared a draft report setting out our findings followed by a final report.

There are limitations to any external audit. Audits are not an absolute guarantee of the truth or reliability of agency information or the effectiveness of internal controls. They may not identify all matters of significance. This is because external audit techniques involve:

- Professional judgement as to "good industry and market operational practice"
- The use of sample testing
- An assessment of the effectiveness of internal control structures and
- An assessment of risk.

1. Introduction

A market audit does not guarantee every procedure and action carried out in the operation of the electricity market in the audit report, nor does it examine all evidence and every transaction. However, our audit procedures should identify errors or omissions significant enough to adversely affect the decisions of users of the market audit report.

We also note that there is a high degree of compliance monitoring built into the market design. Should System Management not carry out a requirement of the Market Rules, those cases that are material will have affected either the IMO or market participants and will have been raised.

Where non-compliant procedures or actions are identified, these are classified as being:

- *Material*, in that they may affect decisions made by market participants or otherwise affect the outcome of the market, or
- *Non-material*, in that
 - they do not comply with the wording or the Market Rules but do comply with the intention of the Market Rules or
 - they do not comply with the Market Rules but they are not likely to affect decisions made by market participants or otherwise affect the outcome of the market.

In performing this market audit, we are conscious that it covers the first year of operation of the Western Australian Wholesale Electricity Market. It has been PA's experience that during the first year of operation any electricity market will require some minor changes to the Market Rules to correct problems created by drafting that does not allow reasonable operational practices.

We have found this to be the case here and many of the reported non-compliances are due as much to minor drafting errors, with the spirit of the rule being complied with although the wording is not. Where this has been the case, we have suggested that a Rule Change be proposed to better express the intent of the rule.

1.3 STATUS OF THE POWER SYSTEM OPERATIONAL PROCEDURES

This audit has relied upon both the Power System Operational Procedures approved by the Minister for Energy and on System Management Internal Procedures. We understand that System Management intends to review the Power System Operational Procedures for their continued relevance as it believes that in their current form they do not provide a relevant basis for operation, either for System Management or for market participants. We have no view as to any outcome of this forthcoming review and are reporting on the present Power System Operational Procedures vis-à-vis the Market Rules.

1.4 STRUCTURE OF THIS REPORT

This report contains PA's analysis of the operation of System Management on a Market Rules chapter by chapter basis.

However, when considering the mapping of System Management procedures to the Market Rules, it is relevant that these procedures are written around functions performed by System Management, rather than directly around requirements of the rules. By contrast, because the IMO's functions are defined by the nature of the Rules, its procedures are written to ensure compliance on a Rule by Rule basis.

1. Introduction

Appendix A to this report records the mapping of Market Rule obligations to the appropriate Market Procedures and System Management Internal Procedures

1.5 ACKNOWLEDGEMENTS

PA would like to thank the managers and staff of System Management who willingly provided information and shared in discussions with us while we carried out this market audit.

2. MARKET RULE CHAPTER 1 – INTRODUCTION

2.1 DOCUMENTATION

Market Rule Chapter 1 sets out the Introduction to the Market Rules such as the objectives of the market, glossary and role of System Management.

There are no relevant Power System Operational Procedures and there are no Internal Procedures.

2.2 COMPLIANCE WITH CHAPTER 1

The obligations placed in System Management under Chapter 1 of the Market Rules relate to transitional matters or matters that expired at the Energy Market Commencement.

2.3 OPINION

System Management has no obligations under Chapter 1 of the Market Rules.

3. MARKET RULE CHAPTER 2 – ADMINISTRATION

3.1 DOCUMENTATION

Market Rule Chapter 2 sets out the Functions and Governance Rules which affect both the Market Development and Market Operations functions of System Management. The relevant Power System Operational Procedures are:

- Ancillary services
- Commissioning and testing
- Communication and control systems
- Monitoring and reporting protocol
- Power system security.

and the relevant System Management Internal Procedures are:

- Creating Rule Change Proposals
- Responding to Pre-Rule Change Discussion Papers, Rule Change Proposals, and Draft Reports
- Identifying IT changes required from Rule Changes
- Identifying Broad Procedure Changes Required from Rule Changes
- Identifying Internal Process Changes Required from Rule, Procedure, and Policy Changes
- Creating Procedure Change Proposals
- Updating Procedures following Approved Procedure Changes
- How System Management Monitors Compliance of Participants
- How to notify the IMO of alleged breaches of the Market Rules
- Identifying And Rectifying System Management Process Or Market Rule Non-Compliance
- Internal Review Mechanisms
- SM Market Audit
- Entering a Dispute
- Consultation
- Creation of Allowable Revenue Application
- Annual Budget
- Consulting with IMO regarding Facility Registration
- Advising the IMO regarding inaccurate Standing Data

3. Market Rule Chapter 2 – Administration

3.2 COMPLIANCE WITH CHAPTER 2

The procedures to be followed are fully documented and, if followed, should result in compliance with the Market Rules. However, the areas of non-compliance shown below have been noted

Clause	Non-compliance	PA comment
2.34.2A	<p>Participants must revise Standing Data as soon as practical if the data is inaccurate. System Management must monitor compliance with this clause as required by MR 2.13.9.</p> <p>a) System Management has a general review process for Standing Data which is used for dispatch purposes.</p> <p>b) Following identification of incorrectness of any dispatch data, Participants are requested to revise Standing Data as soon as practical.</p> <p>c) System Management has advised the IMO of one instance where this data was not revised in a timely fashion.</p> <p>d) System Management does not, nor has any ability to, identify the correctness of any non-dispatch standing data (such as balancing prices or nominated maximum intermittent loads etc). System Management considers that it is the responsibility of the IMO to determine accuracy of these values.</p>	<p>This is primarily a responsibility of market participants.</p> <p>System Management has a responsibility to monitor those items of standing data which it can reasonably be expected to know the appropriate values</p> <p>System Management can not be expected to monitor those items of Standing Data of which it has no visibility.</p> <p>PA suggests that this rule be revised to more appropriately assign the monitoring responsibility.</p>
2.34.3	<p>Participants must revise Standing Data in a certain format. System Management must monitor compliance with this clause as required by MR 2.13.9.</p> <p>a) System Management is not provided with all the information submitted under 2.34.3. System Management is not provided with the reason for the change, nor the effective date.</p> <p>b) System Management does not, and has no ability to, determine whether the information submitted under this clause is submitted in the correct form.</p> <p>c) System Management does not monitor compliance with this clause, and considers that the clause 2.13.9 should be amended to remove this obligation, as the obligation should reside with the IMO.</p>	<p>The comments above apply equally to this point.</p>
2.34.10	<p>When System Management becomes aware of inaccurate Standing Data it must notify the IMO.</p> <p>a) From Market commencement until March, when it notified the IMO, System Management was aware that the response time for a facilities was incorrect.</p> <p>b) Due to this knowledge, System Management did not dispatch the facility as would have been required by the Dispatch Merit Order.</p> <p>c) System Management did not notify the</p>	<p>Noted.</p>

3. Market Rule Chapter 2 – Administration

Clause	Non-compliance	PA comment
	IMO as soon as practical.	

3.3 OPINION

With the exception of the non-compliance noted above, System Management has complied with its obligations under Chapter 2 of the Market Rules.

4. MARKET RULE CHAPTER 3 – POWER SYSTEM SECURITY AND RELIABILITY

4.1 DOCUMENTATION

Market Rule Chapter 3 sets out the Power System Security and Reliability Rules which affect both the Market Development, Market Operations, System Planning and System Operations functions of System Management. The relevant Power System Operational Procedures are:

- Ancillary Services
- Commissioning and testing
- Dispatch
- Facility Outages
- Monitoring and reporting
- MT PASA
- Security
- ST PASA

and the relevant System Management Internal Procedures are:

- Who may initiate a high risk operating state
- Who may initiate an emergency operating state
- Determining load shedding requirements and plans
- Determining whether an event is reportable/Reporting to IMO
- Ancillary Services: Requirements determination for upcoming year.
- Scheduling facilities to ensure sufficient Ancillary Services
- Producing the MT PASA
- Medium Term PASA Publishing
- Producing the ST PASA
- Short Term PASA Publishing
- How to accept or reject a generation outage
- How to accept or reject a transmission outage
- How to coordinate outages between generation and transmission
- How to approve or reject a generation outage
- How to approve or reject a transmission outage
- How to approve or reject on the day opportunistic maintenance
- How to create the 3.19 report to IMO

4. Market Rule Chapter 3 – Power system security and reliability

- How to recall a facility from outage
- Forced Outages - How to determine whether a Consequential Outage meets the Criteria.
- How to determine whether a forced outage should be registered
- Commissioning Tests for SSOC
- Commissioning Tests for SOPE
- How do we allow de-commitment
- Provide the IMO with Ancillary Service Contract Information
- Provide the IMO with Ancillary Service Contract Information for a Trading Month.

4.2 COMPLIANCE WITH CHAPTER 3

The procedures to be followed are fully documented. However, some procedures related to PASA reports are not in compliance with the Market Rules while it does not comply with others on pragmatic grounds.

The areas of non-compliance are shown below:

Clause	Non-compliance	PA comment
3.16.4	<p>Participants are required to provide information to System Management on a regular basis. System Management must monitor compliance with this clause as required by MR 2.13.9.</p> <p>a) SMMITS has the ability for Participants to provide the information required. This would be, in effect, modification of outage data held by System Management.</p> <p>b) System Management uses outage notifications as the basis of PASA.</p> <p>c) Information from Participants for other items, such as proposed closure of facilities, is notified to System Management by email as required. In future, System Management may require Participants to use the facility in SMMITS in accordance with the PSOP. Network information is available to System Management. System Management does not use items 3.16.4 (b) iv and v.</p> <p>d) System Management does not see a need to ensure Participants provide any information via this clause as they comply through the outage planning process.</p> <p>e) The information required by this clause, which is not provided via outage planning, does not materially impact on the PASA process, so therefore System Management has not placed a high emphasis on ensuring compliance with this clause.</p>	<p>This appears to be a case of System Management not complying with the letter of the Market Rules but complying with their spirit as the information required from rule participants is provided to System Management via other means.</p>
3.16.9	<p>System Management must include DSM information in the MT PASA.</p> <p>a) System Management does not allow for</p>	<p>See the discussion in Section 4.2.1 below.</p>

4. Market Rule Chapter 3 – Power system security and reliability

Clause	Non-compliance	PA comment
3.17.1	<p>DSM in the MT PASA.</p> <p>b) A Rule Change to allow System Management to allow for “a reasonable estimate” of DSM in the PASA will be in force in the near future.</p> <p>System Management must perform a PASA study whenever material changes have occurred, and provide the study to the IMO as soon as practical.</p> <p>a) System Management performs a PASA study whenever material changes have occurred.</p> <p>b) System Management does not provide the updated study to the IMO due to operational reasons. Operationally, it is only practical to perform this task weekly.</p>	See the discussion in Section 4.2.2 below.
3.17.5	<p>Participants are required to provide information to System Management every Thursday. System Management must monitor compliance with this clause as required by MR 2.13.9.</p> <p>a) SMMITS has the ability for Participants to provide the information required. This would be, in effect, modification of outage data held by System Management.</p> <p>b) As the required information is provided via outage planning System Management has not placed a high emphasis on ensuring compliance with this clause.</p> <p>c) System Management does not see a need to ensure Participants provide any information via this clause as they comply through the outage planning process.</p>	Noted
3.17.6	<p>Participants must update information provided in 3.17.5 if the information has changed. System Management must monitor compliance with this clause as required by MR 2.13.9.</p> <p>a) SMMITS has the ability for Participants to provide the information required. This would be, in effect, modification of data previously provided under MR 3.17.5.</p> <p>b) As the required information is provided and updated via outage planning System Management has not placed a high emphasis on ensuring compliance with this clause.</p> <p>c) Should information be provided under MR 3.17.5, System Management will review the adequacy and determine, using SCADA information, whether the information should have been updated.</p>	Noted.
3.17.9	<p>System Management must include DSM information in the ST PASA.</p> <p>a) System Management does not allow for DSM in the ST PASA.</p> <p>b) A Rule Change to allow System Management to allow for “a reasonable</p>	See the discussion in Section 4.2.1 below.

4. Market Rule Chapter 3 – Power system security and reliability

Clause	Non-compliance	PA comment
	estimate” of DSM in the PASA will be in force in the near future.	
3.17.9 (h)	<p>System Management must include fuel restriction information in the ST PASA.</p> <p>a) System Management is generally notified about fuel restrictions for the following Trading Day after 3 pm.</p> <p>b) System Management advises Participants of fuel restriction information via a Dispatch Advisory, and therefore there is no benefit for the published ST PASA to be updated, unless the fuel restriction is for an extended period.</p> <p>c) Unless fuel restrictions are known at the time of producing the ST PASA, they are not included. System Management does not update the published ST PASA in these circumstances.</p>	<p>PA note that the fuel restrictions are advised via a Dispatch Advisory and accepts the point is one of timing; System Management does not have fuel restriction data in time for the ST PASA run. If the data is not available, it can not be included in the ST PASA run.</p> <p>However, if the fuel restrictions are a material change (see the response to 3.17.1), then PA’s view is that ST PASA should be re-run (which it is) and the results published</p> <p>See the discussion below in 4.2.2.</p>
3.18.2 (f)	<p>Facilities on the List of Equipment must schedule outages in accordance with 3.19, 3.20, and 3.21. System Management must monitor compliance with this clause as required by MR 2.13.9.</p> <p>a) All scheduled generation facilities comply with this clause.</p> <p>b) All transmission facilities comply with this clause.</p> <p>c) System Management has negotiated with Synergy as to the requirements for both the Synergy DSM program and SIMCOA. Synergy is complying with the requirements for SIMCOA, and System Management accepts that it is infeasible for Synergy to schedule outages for the DSM Program in accordance with 3.19 and 3.20, and also that it is infeasible for Synergy to determine whether individual components of the DSM Program are available during a Particular interval.</p> <p>d) Non-scheduled generators greater than 10 MW (the windfarms), do not comply with the requirements of 3.21.4. However, System Management has proposed a Rule Change which will mean that windfarm outages will not be forwarded to the IMO as they have a RCOQ of zero. Further, capacity from intermittent generation is assumed to be a reasonable estimate for the purposes of outage planning. Therefore, provision of this information does not materially impact the outage planning process. System Management has not, and will not, ensure compliance of intermittent generators with this clause.</p>	<p>PA note that items (a) and (b) comply with the Market Rules.</p> <p>Items (c) and (d) relate to plant and DSM that is less than 10 MW in magnitude and which can be considered not to have a material effect on the scheduling and dispatch of the market.</p> <p>PA considers this non-compliance as being not material.</p>
3.21.4	Facilities on the List of Equipment must notify System Management of forced outages. System Management must monitor compliance	For practical reasons System Management adopt a tolerance below which they do not report

4. Market Rule Chapter 3 – Power system security and reliability

Clause	Non-compliance	PA comment
	with this clause as required by MR 2.13.9. a) Due to operational constraints and error margins, System Management only monitors for outages greater than 10 MW, and for at least one Trading Interval. This value was chosen for parity with the EGC compliance threshold (MR 7.6A).	compliance by participants PA considers this non-compliance as being not material. We accept that the use of a tolerance by System Management is a practical measure.

The two principal areas of concern relate to:

- Updated runs of PASA are required when there is a material change in conditions or fuel restrictions
- The non-inclusion of Demand Side Management (DSM) data in the PASA runs.

4.2.1 Non-inclusion of DSM data in PASA runs

Under Market Rule 3.16.9

By the 15th day of each month, System Management must provide to the IMO and the IMO must publish the following information developed as a result of its Medium Term PASA study for each week in the Medium Term Planning horizon described in clause 3.16.2:

(c) forecast total available Demand Side Management capacity by week and by constrained region;

Market Rule 3.17.9 imposes the same requirement with respect to ST PASA.

System Management do not include DSM data in the PASA runs, principally because it cannot with certainty estimate the amount of DSM that may be available. While a non-compliance with the Market Rules PA does not consider it to be material.

We note that Rule Change RC_2007_03, intended to take effect from 1 October 2007, will allow System Management to include a reasonable estimate of DSM at its discretion and will remove this cause of non-compliance.

4.2.2 Updated PASA runs

Under Market Rule 3.17.1

System Management must carry out a Short Term PASA study:

(a) Every Thursday, and provide the Short Term PASA results referred to in clause 3.17.9 to the IMO by 4:30 PM; and

(b) On any other day if it determines that changes have occurred that would materially affect market outcomes during the first week of the period covered by the previous Short Term PASA study, and provide the Short Term PASA results referred to in clause 3.17.9 to the IMO as soon as practical.

PA believes that System Management does not comply with the final condition in 3.17.1(b); that is “and provide the Short Term PASA results referred to in clause 3.17.9 to the IMO as soon as practical” and that the non-compliance is material.

4. Market Rule Chapter 3 – Power system security and reliability

Firstly, not to provide the results to the IMO is in breach of 3.17.1(b) because PA believes that it is practical to provide ST PASA results more frequently than once a week. System Management re-run ST PASA whenever changes occur to outage plans so that they have an updated PASA result. The process of then providing those results to the IMO consists of sending the updated results to the IMO as an attachment to an email, this being the procedure used to send the weekly results every Thursday. Therefore, PA believes that it is practical to advise the IMO when “changes have occurred that would materially affect market outcomes” more frequently than once a week.

Secondly, the updated PASA results need only be provided when “changes have occurred that would materially affect market outcomes”. If the changes do not materially affect market outcomes, then they need not be provided. Therefore, those changes that should have been provided must be those that would have materially affected market outcomes; hence the non-compliance is material.

PA is aware that System Management has raised two counter arguments to our view which should be noted.

Firstly, System Management agrees that, although they do re-run ST PASA, they do not provide the updated PASA study to the IMO. System Management’s view is:

- That the Market Rules requirement of “as soon as practicable” is met through provision to the IMO for publication on a weekly basis and
- That they consider that market participants are not disadvantaged through weekly publication of PASA, rather than more frequently.

Their view is that participants use PASA – if at all – as a ready reckoner of whether sufficient margin exists to make application for an outage. System Management accept the determination of sufficient margin through the use of PASA is dynamic and constantly changing and that PASA is not relied upon for determining whether to apply for an outage – a phone call to the planning engineers at System Management is used instead.

Secondly, System Management believe that, even if a failure to provide updated ST PASA results to the IMO is considered to be “non-compliant”, it cannot be seen as a “material” non-compliance. Their position here is that decisions made by market participants to apply for an outage are not affected by the fact that ST PASA is not provided to the IMO more frequently than weekly. System Management note that at no time have participants requested that the ST or MT PASA be published with greater frequency.

In essence, System Management are arguing that:

- There is no need to publish more than once a week because market participants have alternative access (by telephone) to the extent of the system margin, and
- Market participants, by not asking for more frequent publication, are indicating that once a week is sufficient for their purposes.

Nevertheless, PA believes that the key point here lies in the phrase “that would materially affect market outcomes”. If the change does not materially affect market outcomes then 3.17.1(b) has no effect and the results of the PASA run need not be provided to the IMO for publication.

However, if the changes would materially affect market outcomes, then they must be notified and not to do so is a material breach of the Market Rules.

4. Market Rule Chapter 3 – Power system security and reliability

The argument that “at no time have participants requested that the ST or MT PASA be published with greater frequency” supposes that one of three conditions apply:

- No changes have occurred that have materially affected market outcomes so the situation has not arisen
- Changes that might have occurred and materially affected market outcomes if published would not have occurred in practice so the *ex post* market outcomes would not have changed or
- That the participants have not been aware that possible material changes to the PASA results have not been advised to them, believing that all changes have indeed been non-material and so not advised. In other words the participants did not know what they did not know and so had no reason to ask.

Finally, market participants are entitled to rely on Rule 3.17.1 to advise them of material changes in the PASA results and not to have to rely on an alternative mechanism.

We note that if market participants were of the view that 3.17.1(b) is superfluous, then there might be a case for a Rule Change proposal. However, without such a view from the market participants, PA concludes that the failure to provide the results of the PASA run constitutes a material non-compliance with Chapter 3.

System Management have now advised that they report material changes in the PASA and will prepare an Internal Procedure to provide guidance to its staff.

4.3 OPINION

Although System Management generally complies with Chapter 3 of the Market Rules, we have noted a number of areas non-material non-compliances and one material case of non-compliance.

5. MARKET RULE CHAPTER 4 – RESERVE CAPACITY

5.1 DOCUMENTATION

Market Rule Chapter 4 sets out the Reserve Capacity Rules which affect both the Market Development and System Operations functions of System Management. The relevant Power System Operational Procedure is:

- Commissioning and Testing

and the relevant System Management Internal Procedures are:

- How to perform a (Reserve Capacity)Test
- How to notify the IMO of details of (Reserve Capacity)Tests.

5.2 COMPLIANCE WITH CHAPTER 4

5.2.1 Procedures

The procedures to be followed are fully documented and, if followed, will ensure compliance with the Market Rules to the extent that System Management can comply. The following non-compliance has been noted.

Clause	Non-compliance	PA comment
4.25.9 (e)	System Management must inform the IMO whether a Capacity Test was successful. a) The IMO has notified System Management that the IMO will perform this task. b) In any event, System Management does not have access to metered schedules and therefore cannot determine whether the Test was successful.	PA agrees that System Management are not able to comply with this rule and suggests that a Rule Change be developed to more appropriately specify what System Management is required to do.

Discussions with IMO management has indicated that they agree that System Management cannot report whether “the test was successful” and that determining the success or otherwise of a Capacity Test is a responsibility of the IMO, and not of System Management. A Rule Change to clarify what System Management is required to do is recommended.

5.3 OPINION

Other than the non-material non-compliance cited above, System Management comply with Chapter 4 of the Market Rules.

6. MARKET RULE CHAPTER 5 – NETWORK CONTROL SERVICE PROCUREMENT

6.1 DOCUMENTATION

Market Rule Chapter 5 sets out the Network Control Service Procurement Rules which affect both the Market Development, Market Operations, System Planning and System Operations functions of System Management. There are no relevant Power System Operational Procedures and the relevant System Management Internal Procedures.

6.2 COMPLIANCE WITH CHAPTER 5

System Management does not have any documented procedures, either in the form of Power System Operational Procedures or in the form of Internal Procedures, as required by Market Rule 5.7.4:

System Management must document the procedure it will follow in calling on Registered Facilities to provide services under Network Control Service Contracts in the Power System Operation Procedure, and System Management must follow that documented Market Procedure when calling on Registered Facilities to provide services under Network Control Service Contracts.

The Market Rules are silent on when such a procedure must be prepared and we note that the status of this process is that it “will be developed by System Management as required”. Therefore, this non-compliance is technical only and has no effect.

6.3 OPINION

Other than the non-material technical non-compliance cited above, System Management complies with Chapter 5 of the Market Rules.

7. MARKET RULE CHAPTER 6 – ENERGY MARKET

7.1 DOCUMENTATION

Market Rule Chapter 6 sets out the Energy Market Rules which affect both the Market Development, Market Operations, System Planning and System Operations functions of System Management.

There are no relevant Power System Operational Procedures, nor relevant System Management Internal Procedures.

7.2 COMPLIANCE WITH CHAPTER 6

The requirements on System Management consist of providing the IMO with data and requiring System Management comply with directions issued by the IMO as a part of a Market Advisory.

We have not been able to find any evidence of non-compliance with Chapter 6 of the Market Rules.

7.3 OPINION

System Management has complied with Chapter 6 of the Market Rules.

8. MARKET RULE CHAPTER 7 – DISPATCH

8.1 DOCUMENTATION

Market Rule Chapter 7 sets out the Dispatch Rules which affect the Market Development, Market Operations, System Planning and System Operations functions of System Management. The relevant Power System Operational Procedures are:

- Dispatch
- EGC Dispatch
- Monitoring and Reporting
- Data Cleansing.

and the relevant System Management Internal Procedures are:

- Maintain Loss Factor information
- Preparing and updating load forecasts
- Preparing list of Ancillary Service daily requirements (7.23A)
- Providing outage notifications by alternate means
- Confirming receipt of Resource Plans
- Confirming receipt of DMO and initial Fuel Declarations.
- Dispatch Instructions & Dispatch Orders. Cancellation of Dispatch Instructions or Dispatch Orders.
- How to Dispatch curtailable loads
- Preparing EGC forecast, Dispatch Plan and Ancillary Services plan 7.6A.2 (c))
- How to issue Dispatch Orders
- Determining EGC Non-compliance
- EGC monthly meeting
- How to issue and cancel Dispatch Instructions to IPP facilities
- How to determine whether confirmation of Dispatch Instructions has been received?
- How to confirm synchronisation or de-sync
- How to monitor compliance with Resource Plans
- Issue a warning for dispatch deviation
- How to issue and cancel Dispatch Advisories
- How to create the 7.12 Status Report
- Settlement Data Non Scheduled Generators.

8.2 COMPLIANCE WITH CHAPTER 7

The procedures to be followed are fully documented and, if followed, will ensure compliance with the Market Rules.

We have observed the dispatch of the power system by System Management and while some practices are not those found in Dispatch Centres in more mature electricity markets, they are quite adequate to provide compliance with Chapter 7 of the Market Rules. For example:

- Dispatch instructions to IPPs instructions are given by telephone (as required by the rules) and recorded electronically onto a dedicated voice recording system.
- They are confirmed through electronic message to the facility via the Electronic Log Book (part of SMMITS) so that they can be transmitted to the IMO for settlements purposes.
- Dispatch instructions to Verve are dispatched by way of telephone call or automatically by the dispatch operator.
- Both types of instruction are also logged by hand for ease of “flagging” to the next shift or operations staff the following day. Verve dispatch instructions are not required by the IMO for settlement purposes.

We are of the view that the present practice is appropriate to the requirements of System Management and complies with the Market Rules.

Minor areas of non-compliance noted are:

Clause	Non-compliance	PA comment
7.2.5	<p>Intermittent Generators with a capacity in excess of 10 MW must provide a forecast of generation to System Management. System Management must monitor compliance with this clause as required by MR 2.13.9.</p> <p>a) System Management does not currently use these forecasts for any purpose.</p> <p>b) Several Participants who should provide forecasts do not.</p> <p>c) System Management will soon advise all Participants that System Management does not require these forecasts until further notice.</p> <p>d) System Management will not monitor compliance with this clause until System Management uses the forecasts.</p>	<p>PA has been advised that because neither System Management nor the IMO use these forecasts, System Management has not been reporting the non-compliance by participants to the IMO. Following discussions between the IMO and System Management, this non-compliance will be included in Systems Management's Three Monthly Report.</p> <p>Therefore, PA considers that this non-compliance is not material.</p>
7.6A.2 (c)	<p>System Management must provide a dispatch plan to Verve each day.</p> <p>a) System Management does not create a formal Dispatch Plan as defined in 7.6A.2 (c).</p> <p>b) System Management does produce a dispatch plan for Verve, which is varied by dispatch orders. The information is not recorded as a “plan”, but can be reconstructed by System Management should the need arise (such as an event that could endanger the SWIS).</p> <p>c) System Management is developing a</p>	<p>See the discussion below in Section 8.2.1 on this point.</p>

8. Market Rule Chapter 7 – Dispatch

Clause	Non-compliance	PA comment
	tool to produce the Dispatch Plan. This is currently budgeted for 2008/09.	
7.7.4	<p>System Management must dispatch according to the Dispatch Merit Order.</p> <p>a) On 7/03/07, following the receipt of a change of fuel declaration from liquids to non-liquids, System Management issued a dispatch instruction to Parkeston with a response time of 13:56 (WST), which equates to 4 minutes before the commencement of the interval (14:00) for which the change in fuel type was to take effect.</p> <p>b) System Management has reviewed processes to ensure this situation does not repeat.</p>	Noted.
7.9.1 (b)	<p>Participants must notify System Management 5 minutes before synchronising. System Management has agreed to monitor this clause.</p> <p>a) System Management is not monitoring this clause, as it is not essential for the operation of the SWIS.</p> <p>b) Many Participants are not providing this notice. In fact, System Management has an arrangement with all Participants that this notice should only be provided on an exception basis ie, if the scheduled time is varied.</p> <p>c) System Management is considering a Rule Change.</p>	Noted.
7.9.5 (b)	<p>Participants must notify System Management 5 minutes before de-synchronising. System Management has agreed to monitor this clause.</p> <p>a) System Management is not monitoring this clause, as it is not essential for the operation of the SWIS.</p> <p>b) Many Participants are not providing this notice. In fact, System Management has an arrangement with all Participants that this notice should only be provided on an exception basis ie, if the scheduled time is varied.</p> <p>c) System Management is considering a Rule Change.</p>	Noted.
7.12.1	System Management must provide a report to the IMO once every three months on the performance of the market with respect to the dispatch process.	The report for the period ending 27 June 2007 was not sent to the IMO until September due to an error by System Management.
7.13.1 (e)	<p>System Management must notify the IMO of information in accordance with this clause.</p> <p>a) System Management did not provide operation load data, resource SCADA and outage data for Trading Dates 15 and 16 of June in the time frame indicated by MR 7.13.1.</p> <p>b) Operation load data and Resource</p>	

8. Market Rule Chapter 7 – Dispatch

Clause	Non-compliance	PA comment
	<p>SCADA was sent 18 minutes late.</p> <p>c) Outage data was provided the following day.</p> <p>d) System Management has revised processes to ensure that this situation does not recur.</p>	
7.13.1 (e)	<p>System Management must notify the IMO of outages in accordance with this clause.</p> <p>a) Participants often provide forced outage notifications to System Management outside of the time-frame indicated in MR 7.13.1.</p> <p>b) System Management has proposed Rule Changes to impose a deadline to the provision of notifications to System Management, and to extend the timeframe for MR 7.13.1 (e).</p>	See the discussion below in section 8.2.2 on this point.
7.7.6 (b)	<p>Participants must confirm receipts of Dispatch Instructions as soon as practical. System Management must monitor compliance with this clause as required by MR 2.13.9.</p> <p>a) Dispatch Instructions issued by System Management are first issued verbally and followed up with a written instruction for the purposes of settlement.</p> <p>b) As all verbal instructions are acknowledged, System Management considers that acknowledgement of the written instructions is a commercial function.</p> <p>c) System Management does review whether written Dispatch Instructions are acknowledged, but this review is performed infrequently at present.</p>	PA accepts that the present means of issuing dispatch instructions via a time stamped voice recording is an acceptable means of obtaining a confirmation of dispatch instructions from participants, given that the participant has the opportunity to reject the dispatch instruction, and considers that this does not constitute a non-compliance with the Market Rules.

8.2.1 Non supply of a dispatch schedule to Verve Energy

Under Market Rule 7.6A2(c)

With respect to the scheduling of the Electricity Generation Corporation Facilities

(c) System Management must provide to the Electricity Generation Corporation by 12:30 PM on the Scheduling Day associated with a Trading Day:

- i. a forecast of the requirements for the Electricity Generation Corporation energy, being a forecast of the whole of system energy requirement less the aggregate Net Contract Positions of other Market Participants, for the Trading Day;
- ii. the Dispatch Plan for each Facility for the Trading Day;
- iii. a forecast of the detailed Ancillary Services required from each Facility;

where the format and time resolution of this data is to be described in a procedure.

As explained to PA, the key problem here is one of timing; that the fuel availability data required to produce the Dispatch Plan required is not available until after the deadline for sending the plan to Verve Energy. System Management agreed that that they could send

8. Market Rule Chapter 7 – Dispatch

an empty plan to Verve Energy so as to comply with the deadline but they would then be non-compliant in that the plan would not be a dispatch plan.

System Management advise that it will be developing a software tool in the 2008-9 year which will allow it to comply with this Market Rule.

8.2.2 Late advice of facility outage information

With respect to the non-compliance with Market Rule 7.13.1(e), PA has been advised that System Management has proposed a Rule Change (RC_2007_15) which will have the effect of tightening the deadline for the Market Participant in advising System Management of the outage details. Currently, forced outages may be advised by a market participant “as soon as practicable”. Where a market participant delays advising System Management of a forced outage, System Management may not necessarily be in a position to comply with the timing relating to the provision of forced outage schedules to the IMO (by the business day following the completion of the trading day).

Until this Rule Change takes effect:

- System Management is not complying with Market Rule but
- The non-compliance is not material provided that the data is provided in time for the settlement of the market.

Once the Rule Change has been made, System Management will be in a position of being able to comply with the amended rule.

8.2.3 Other noted non-compliances

With respect to the other non-compliances noted above, we have reviewed these and consider that they are not material in their effect on market participants or on the outcome of the market.

8.3 OPINION

Although System Management does not fully comply with Chapter 7 of the Market Rules, the non-compliances are not considered to be material.

9. MARKET RULE CHAPTER 8 – WHOLESALE MARKET METERING

9.1 DOCUMENTATION

Market Rule Chapter 8 sets out the Wholesale Market Metering Rules. These rules do not apply to System Management. Therefore, there are no relevant Power System Operational Procedures or System Management Internal Procedures.

9.2 OPINION

System Management are not required to comply with Chapter 8 of the Market Rules.

10. MARKET RULE CHAPTER 9 – SETTLEMENT

10.1 DOCUMENTATION

Market Rule Chapter 9 sets out the Settlement Rules which affect the Market Development, Market Operations, System Planning and System Operations functions of System Management. There are no relevant Power System Operational Procedures and the relevant System Management Internal Procedures:

- Notice of Disagreement - How to determine whether an outage meets the criteria
- How to receive and pay settlement invoices.

10.2 COMPLIANCE WITH CHAPTER 9

The procedures to be followed are fully documented and, if followed, will ensure compliance with the Market Rules.

We have not found any evidence of non-compliance on the part of System Management.

10.3 OPINION

System Management has complied with Chapter 9 of the Market Rules.

11. MARKET RULE CHAPTER 10 – MARKET INFORMATION

11.1 DOCUMENTATION

Market Rule Chapter 10 sets out the Market Information Rules affect the Market Development, Market Operations, System Planning and System Operations functions of System Management. There are no relevant Power System Operational Procedures and the relevant System Management Internal Procedures are:

- How to ensure documents and information are retained
- How to ensure the confidentiality status of documents and information

11.2 COMPLIANCE WITH CHAPTER 10

The procedures to be followed are fully documented and, if followed, will ensure compliance with the Market Rules.

11.3 OPINION

As far as we have been able to determine, System Management has complied with Chapter 10 of the Market Rules.

APPENDIX A: MAPPING OF SYSTEM MANAGEMENT MARKET RULE OBLIGATIONS TO POWER SYSTEM OPERATIONAL PROCEDURES AND INTERNAL PROCEDURES

A.1 CHAPTER 1

There are no obligations placed on System Management under Chapter 1.

A.2 CHAPTER 2

Clause	Obligation	Procedure
2.2	System management	
2.2.1	SM has overall function to operate the SWIS in a secure and reliable manner.	PSOP: Power System Security
2.2.2	SM has other general functions, namely: (a) procurement of adequate Ancillary Services where the Electricity Generation Corporation is unable to meet Ancillary Service Requirements (b) assisting the IMO in processing of applications for participation and for the registration, de-registration and transfer of facilities (c) development of Market Procedures (and related amendment or replacement), as required by the Market Rules (d) release of information, as required by Market Rules (e) monitoring compliance by Rule Participants with the Market Rules in respect of Power System Security and Power System Reliability and (f) carrying out any other functions or responsibilities conferred by the Market Rules.	PSOP: Ancillary Services PSOP: Commissioning and Testing PSOP: Communication and control systems PSOP: Monitoring and reporting protocol PSOP: Power system security PSOP: Monitoring and reporting protocol
2.2.3	SM may delegate any of its function(s) under the Market Rules to a person or persons who, in SM's <i>opinion</i> , is competent to carry out such function(s).	
2.5	Rule Change Proposals	
2.5.1	SM may make a Rule Change Proposal by submitting the relevant Rule Change Proposal Form to the IMO.	

Clause	Obligation	Procedure
2.9	Market Procedures	
2.9.2	SM must manage the development, and, where applicable, amendment and replacement of, Market Procedures required to be developed by System Management under the Market Rules.	PSOP: Ancillary Services PSOP: Commissioning and Testing PSOP: Communication and control systems PSOP: Monitoring and reporting protocol PSOP: Power system security PSOP: Monitoring and reporting protocol
2.9.7	SM must comply with any applicable Market Procedures.	
2.10	Procedure Change Process	
2.10.1	SM may initiate Procedure Change Process.	
2.10.3	If an Amending Rule requires System Management to develop new Market Procedures or to amend or replace existing Market Procedures, then the System Management, as applicable, is responsible for the development of, Chapter 2 amendment of or replacement for, Market Procedures so as to comply with the Amending Rule.	
2.10.4	Where the Procedure Change Proposal is developed by System Management, System Management must provide the Procedure Change Proposal to the IMO,.	
2.10.10	Following the closing date for submissions, the IMO or System Management, as applicable, must prepare a Procedure Change Report on the Procedure Change Proposal.	
2.10.11	Where the Procedure Change Report is prepared by System Management, System Management must provide the Procedure Change Report to the IMO.	
2.12	Standard of Performance	
2.12.3 (a)	Standard required for System Management responsibilities under Market Rules.	
2.13	Market Rule Compliance Monitoring and Enforcement	

Clause	Obligation	Procedure
2.13.6	<p>SM must monitor compliance by Rule Participants with the Market Rules in respect of:</p> <ul style="list-style-type: none"> (a) the specific Market Rules under 2.13.9 and (b) Market Procedures developed by SM. <p>SM must monitor Rule Participant compliance in accordance with the Monitoring and Reporting Protocol. Any alleged breach of the Market Rules and Market Procedures must be reported to the IMO.</p>	PSOP: Monitoring and Reporting, sections 3, 4 and 6
2.13.7.	System Management must ensure it has processes and systems in place to allow it to monitor Rule Participants' behaviour in accordance with clause 2.13.6.	PSOP: Monitoring and Reporting
2.14	Audit	
2.14.6	Where required by the IMO, System Management must demonstrate compliance with the Market Rules and Market Procedures (including being audited by the Market Auditor).	
2.15	Monitoring and Reporting Protocols	
2.15.4	SM must develop and implement a Monitoring and Reporting Protocol.	PSOP: Monitoring and Reporting Protocol
2.16.7	Where requested, System Management must provide information to the Economic Regulation Authority as part of its Marketing Monitoring function.	
2.19.1	SM may issue Notice of Dispute to a party (or parties) involved in such dispute.	
2.21.3	SM must consult on such matters, with such people and over such timeframes as specified under the Market Rules.	
2.23.3	SM must seek approval of its Allowable Revenue from the Economic Regulation Authority for each Review Period.	
2.23.5	SM must prepare a budget proposal for <u>each</u> of the services carried out by it under clause 2.23.1 by 30 April each year.	
2.23.8	SM must apply to the Economic Regulation Authority where a budget proposal is	

Clause	Obligation	Procedure
	likely to result in revenue recovery (over the relevant Review Period) more than 15% above the Allowable Revenue determined by the Economic Regulation Authority.	
2.23.9	SM must provide a copy of the budget proposal to the IMO by 30 April each year.	
2.23.11	SM must provide the (finalised) budget to the IMO.	
2.28.3	SM must inform the IMO that it has determined that it does not require information about the relevant network to maintain Power System Security and Power System Reliability.	
2.28.14	No requirement for System Management to register as a Rule Participant.	
2.30.11(b)	SM must follow documented Registration Procedure when processing applications for facility aggregation and disaggregating previously aggregated facilities.	
2.30A.6(b)	SM must follow the documented Market Procedure when processing applications for exemption from Spinning Reserve.	
2.31.8	SM must allow a facility holding an Arrangement for Access to operate tests required under such arrangement.	PSOP: Commissioning and Testing, section 4.2
2.31.22(b)	SM must facilitate participation by an approved application in a Rule Participant class or Facility Class as soon as practicable.	
2.31.23(c)	SM must assist the IMO in relation to documenting the registration, de-registration and transfer process in accordance with the applicable Registration Procedure.	
2.34.10	SM must notify the IMO as soon as practicable where it becomes aware that a Rule Participant's Standing Data is inaccurate (or will become inaccurate in the future).	
2.34.15	SM must commence using Standing Data (or revised Standing Data) as soon as	

Clause	Obligation	Procedure
	it is received from the IMO.	
2.35.4	SM must document the communications and control system requirements necessary to support the dispatch process in the Power System Operation Procedure.	PSOP: Communication and Control Systems

A.3 CHAPTER 3

Clause	Obligation	Procedure
3.2	Technical Envelope, Security and Equipment Limits	
3.2.2	SM must record Equipment Limit information in accordance with the Power System Operation Procedure.	
3.2.4	SM must record Security Limit information in accordance with the Power System Operation Procedure.	
3.2.6	SM must establish and modify the Technical Envelope in accordance with clause 3.2.5 and the Power System Operation Procedure.	
3.2.7	SM must develop a Power System Operation Procedure.	
3.2.8	SM must operate the SWIS in accordance with the Power System Operation Procedure and the Technical Envelope for the applicable SWIS Operating State.	
3.3	Normal Operating State	
3.3.1	Power of System Management to determine when the SWIS is in a Normal Operating State.	
3.3.2	SM must do, or must not do, certain things when the SWIS is in a Normal Operating State.	
3.3.3	SM may include guidelines in the Power System Operation Procedure describing	

Clause	Obligation	Procedure
	matters it will take into account in making a determination under clause 3.3.1 in respect of a Normal Operating State.	
3.3.4	SM shall determine when the SWIS is in a High Risk Operating State.	
3.4	High Risk Operating State	
3.4.2	SM must do, or must not do, certain things when the SWIS is in a High Risk Operating State.	PSOP: Security, section 7.2
3.4.3	SM may take certain steps when the SWIS is in a High Risk Operating State.	PSOP: Security, section 7.2.4
3.4.4	SM may take such other actions as it considers are required to return the SWIS to a Normal Operating State.	PSOP: Security, section 7.2.4
3.4.5	SM must return the SWIS from a High Risk Operating State to a Normal Operating State as soon as it is able.	PSOP: Security, section 7.2.1
3.4.9	SM may include guidelines in the Power System Operation Procedure describing matters it will take into account in making a determination under clause 3.4.1 in respect of a High Risk Operating State.	PSOP: Security, section 7.1.1
3.5	Emergency Operating State	
3.5.1	SM shall determine when the SWIS is in an Emergency Operating State.	PSOP: Security, section 8.1
3.5.3	Prohibition on System Management taking any actions that, in its <i>opinion</i> , would be reasonably likely to lead to an Emergency Operating State.	
3.5.4	SM <u>must not</u> require Registered Facilities to operate inconsistently with the Security Standards or their Equipment Limits during an Emergency Operating State.	PSOP: Security, section 8.3.3.c
3.5.5	SM may take certain steps when the SWIS is in an Emergency Operating State.	PSOP: Security, section 8.3.4
3.5.6	SM must return the SWIS from an Emergency Operating State to a Normal Operating State as soon as it is able.	PSOP: Security, section 8.3.1
3.5.7	SM must attempt to operate the SWIS during an Emergency Operating State such to	PSOP: Security, section 8.3.3

Clause	Obligation	Procedure
	minimise disruption to: (a) electricity supply and (b) the implementation of Resource Plans received from the IMO, as is reasonably practicable in the circumstances.	
3.5.11	SM may include guidelines in the Power System Operation Procedure describing matters it will take into account in making a determination under clause 3.5.1 in respect of an Emergency Operating State.	PSOP: Security, section 8.1
3.6	Demand Control	
3.6.1	SM must determine the aggregate requirements for automatic under frequency load shedding in accordance with the SWIS Operating Standards.	PSOP: Security, section 10
3.6.3	SM must ensure that operational plans have the approval of the IMO.	
3.6.4	SM must inform all Network Operators of its operational plans for under frequency load shedding.	PSOP: Security, section 10
3.6.6	SM must make plans for manual load shedding and inform Network Operators of these plans.	PSOP: Security, section 10
3.6.6A	SM shall issue manual disconnection directions to Network Operators.	
3.7	System Restart	
3.7.1	SM must make operational plans and preparations to restart the SWIS in the event of system shutdown.	PSOP: Security, section 10.6
3.7.2	SM must restart the SWIS in the event of system shutdown.	PSOP: Security, section 10
3.8	Investigating Incident in the SWIS	
3.8.1	SM must notify the IMO of any incidents relating to the operation of any equipment which forms part of the SWIS.	POSP: Monitoring and Reporting, section 7.2
3.8.2(c)	SM must comply with any reporting request by the IMO in respect of an incident	POSP: Monitoring and Reporting, section 8.3

Clause	Obligation	Procedure
	notified to the IMO under clause 3.8.1.	
3.10	Ancillary Service Standards	
3.10.1	The standard for Load Following Service is a level which is sufficient to:	PSOP Power System Security 10.1
3.10.2	The standard for Spinning Reserve Service is a level which satisfies the following principles:	PSOP Power System Security 10.2
3.10.4	The standard for Load Rejection Reserve Service is a level which satisfies the following principles:	PSOP Power System Security 10.4
3.10.5	SM may reduce the level of Load Following Service, Spinning Reserve Service and Load Rejection Reserve Service.	PSOP Power System Security 10.1
3.11	Determining & Procuring Service Requirements	
3.11.1	SM must determine all Ancillary Service Requirements in accordance with the SWIS Operating Standards and the Ancillary Service Standards.	PSOP: Ancillary Services
3.11.2	SM must update Ancillary Service Requirements on an annual basis.	PSOP: Ancillary Services, section 4
3.11.3	SM must reassess the level of the Ancillary Service Requirements for an Ancillary Service.	PSOP: Ancillary Services, section 4.5
3.11.6	SM must submit Ancillary Service Requirements to the IMO for approval.	PSOP: Ancillary Services, section 4.3.4
3.11.7	SM must make an annual Ancillary Services plan indicating how the Ancillary Service Requirements will be met.	PSOP: Ancillary Services, section 5
3.11.8	SM may enter into an Ancillary Services Contract with a Rule Participant (other than the Electricity Generation Corporation).	PSOP: Ancillary Services, section 6
3.11.10	SM must report specific details of an Ancillary Service Contract to the IMO.	PSOP: Ancillary Services, section 6.2
3.11.11	SM must report annually to the IMO in respect of Ancillary Services and Ancillary Service Requirements.	http://www.imowa.com.au/Attachments/AncillaryServicesReport2007.PDF

Clause	Obligation	Procedure
3.11.14	SM must document certain procedures, and ensure these procedures are followed, in respect of Ancillary Services and Ancillary Service contracts in the Power System Operation Procedure.	PSOP: Ancillary Services
3.12	Ancillary Service Dispatch	
3.12.1	SM must schedule and dispatch facilities to meet the Ancillary Service Requirements in each Trading Interval.	
3.15	Review of Ancillary Service Requirements Process and Standards	
3.15.1	SM must assist the IMO with its intermittent study in respect of Ancillary Service Standards and the basis for setting Ancillary Service Requirements.	
3.16	Medium and Short Term Planning	
3.16.1	SM must carry out a Medium Term PASA study.	
3.16.3	SM must use the data assembled for the Medium Term PASA study to assist with certain functions.	
3.16.8	SM must review information provided by Rule Participants in accordance with 3.16.4, and, where necessary, seek additional information or clarification.	
3.16.9	SM must provide the IMO with information developed as a result of its monthly Medium Term PASA study.	
3.16.10	SM must document the procedure in relation to Medium Term PASA studies in the Power System Operation Procedure and ensure such procedure is followed by it.	
3.17	Short term PASA	
3.17.1	SM must carry out a Short Term PASA study and provide the results of this to the IMO.	
3.17.4	SM may use the Short Term PASA study to assist in certain functions.	
3.17.9	SM must ensure that the results of the Short Term PASA study provided to the IMO	

Clause	Obligation	Procedure
	include the information required by the IMO.	
3.17.10	SM must document the procedure in relation to Short Term PASA studies in the Power System Operation Procedure and ensure such procedure is followed by it.	
3.18	Outage Scheduling	
3.18.2	SM must compile a list of all equipment on the SWIS that is required to be subject to outage scheduling by SM.	PSOP: Facility Outages, section 4.1
3.18.A2	SM must record any Planned Outage proposed by a Market Participant.	PSOP: Facility Outages, section 9.2
3.18.3	SM must remove any item of equipment from the list compiled in accordance with 3.18.2 where it is directed to do so by the IMO.	
3.18.4	SM must maintain an outage schedule containing information on all scheduled outages.	PSOP: Facility Outages, section 7.1
3.18.5A	SM must prioritise Outage Plans of Market Participants according to time of receipt.	
3.18.5C	SM may require Market Participants to coordinate the timing of their outages when developing Outage Plans which would otherwise unduly impact the operation of one or more Market Participant Registered Facilities.	
3.18.7A	SM may reject an Outage Plan submitted within six weeks of the commencement time of the outage with evaluation.	PSOP: Facility Outages, section 9.4.1
3.18.10	SM must use a risk assessment process to evaluate Outage Plans.	PSOP: Facility Outages, section 12
3.18.11A	SM may relax the Ready Reserve Standard requirements.	PSOP: Facility Outages, section 10.10
3.18.13	SM's conduct in respect of the acceptance of an Outage Plan after evaluation.	PSOP: Facility Outages, section 10.4
3.18.14	SM must use specific criteria where agreement has not been reached between SM, Network Operators and Market Participants in respect of an Outage Plan under clause 13.18.13(d).	PSOP: Facility Outages, section 10.6
3.18.15	SM must submit records to the IMO where a Market Participant or Network Operator	

Clause	Obligation	Procedure
	has applied to the IMO for reassessment regarding the non-scheduling or removal of an Outage Plan from SM's outage schedule.	
3.18.16	SM must otherwise coordinate with Network Operators and Market Participants on a best endeavours basis where an Outage Plan is deemed unacceptable for an alternative time for the relevant outage.	PSOP: Facility Outages, section 10.8.4
3.18.17	SM must keep records of all outage evaluations and decisions made by it under clause 3.18.	PSOP: Facility Outages, section 16.2
3.18.18	SM must assist the IMO with an intermittent review of the outage planning process against the Wholesale Market Objectives.	
3.18.21	SM must document the procedure in relation to conducting outage planning Power System Operation Procedure and ensure such procedure is followed by it.	PSOP: Facility Outages
3.19	Outage Approval	
3.19.3	SM must assess any request by a Market Participant or Network Operator for approval of a Scheduled Outage or Opportunistic Maintenance.	
3.19.5	SM must reject a Scheduled Outage or Opportunistic Maintenance previously approved by it where a change in power system conditions makes it necessary to do so.	
3.19.6	SM must apply specific criteria when considering approval of any Schedule Outages or Opportunistic Maintenance.	
3.19.7	SM must negotiate with a Market Participant or Network Operator on a best endeavours basis to find an alternative time for an outage rejected.	
3.19.13	SM must keep records of all its outage evaluations and decisions (together with related reasons for each) and submit these to the IMO.	
3.19.14	SM must document the procedure in relation to conducting final approval of outages in the Power System Operation Procedure and ensure such procedure is followed by it.	

Clause	Obligation	Procedure
3.20	Outage Recall	
3.20.1	SM may direct a Market Participant or Network Operator that a Facility or item of equipment be returned to service from Planned Outages.	
3.21	Forced Outages	
3.21.3	SM must keep a record all Forced Outages and Consequential Outages.	PSOP: Facility Outages, section 14.3
3.21A	Commissioning Tests	
3.21A.3	SM must only approve a Commission Test for new generating systems which is expected to be registered as Scheduled Generators or existing Scheduled Generators which have undergone significant maintenance.	PSOP: Commissioning and Testing, section 6.0.2
3.21A.9	SM must notify a Market Participant that it has approved a Commissioning Test within 10 Business Days.	PSOP: Commissioning and Testing, section 6.3.4
3.21A.11	SM must notify a Market Participant that it has delayed or cancelled a Commission Test.	PSOP: Commissioning and Testing, section 6.4.1
3.21A.15	SM must document the procedure it follows in scheduling Commissioning Tests in the Power System Operation Procedure and ensure such procedure is followed by it.	PSOP: Commissioning and Testing
3.21B	Decommitment and Reserve Capacity Obligations	
3.21B.3	SM must assess any request for permission by a Market Participant to put a Scheduled Generator holding Capacity Credits into a state where it will take more than four hours to re-synchronise.	PSOP: Dispatch, section 12.3.1.c
3.21B.6	SM must negotiate with a Market Participant where it has not approved a request under 3.21B.3 on a best endeavours basis to find an alternative time for the Scheduled Generator to be put into a state where it will take more than four hours to re-synchronise.	PSOP: Dispatch, section 12.3.1.f
3.21B.8	SM must document the procedure it follows in granting approval in accordance with clause 3.21B in the Power System Operation Procedure and ensure such procedure is	PSOP: Dispatch, section 12.3

Clause	Obligation	Procedure
	followed by it.	
3.22	Settlement Data	
3.22.2	SM must provide specific information to the IMO where it has entered into an Ancillary Contract with a Rule Participant.	
3.22.3	SM must provide specific information to the IMO for each Rule Participant holding an Ancillary Service Contract for a Trading Month where it has entered into an Ancillary Contract with a Rule Participant.	

A.4 CHAPTER 4

Clause	Obligation	Procedure
4.11	Setting Certified Reserve Capacity	
4.11.1(h)(i)	SM must work with the IMO where the IMO seeks to consult with it in respect of whether to refuse or grant Certified Reserve Capacity.	
4.24	Supplementary Reserve Capacity	
4.24.18	SM must follow the procedure documented by the IMO in relation to Supplementary Capacity Contracts in the Reserve Capacity Procedure.	
4.25	Testing, Monitoring and Compliance	
4.25.2(b)	SM must comply with any requirements of the IMO in respect of verifying Reserve Capacity Obligations of a Facility.	
4.25.4	SM must comply with any requirements of the IMO in respect of a Facility which has failed a Reserve Capacity test under clause 4.25.2(b).	
4.25.6	SM must comply with any requirement of the IMO to perform a single re-test of Reserve Capacity where a Market Participant has requested the IMO to require	

Clause	Obligation	Procedure
	System Management to carry out such test.	
4.25.8	SM must notify the IMO within one Business Day where the IMO has requested a test be carried out in accordance with clause 4.25.5 that it can carry out the test within the timeframe stipulated by the IMO without endangering Power System Security and Power System Reliability.	
4.25.9	SM must conduct any Reserve Capacity test under clause 4.25.6 according to specific requirements.	
4.25.14	SM must follow the procedure documented by the IMO in relation to performing Reserve Capacity tests in the Reserve Capacity Procedure.	
4.26	Financial Implications of Failure to Satisfy Reserve Capacity Obligations	
4.26.5(b)	System Management must provide the temperatures described in clause 4.26.5(a)(ii) for a Trading Month to the IMO not later than two Business Days prior to the relevant Non-STEM Settlement Statement Date.	
4.27	Reserve Capacity Performance Monitoring	
4.27.6	SM must work with the IMO where the IMO seeks to consult with it in respect of the implications of any Capacity Credit report provided by a Market Participant.	
4.27.12	SM must follow the procedure documented by the IMO in relation to Reserve Capacity monitoring in the Reserve Capacity Procedure.	
4.28A	Intermittent Load Refunds	
4.28A.2(b)	SM must provide temperatures to the IMO for generating systems where the daily maximum temperature is measured by the SCADA system operated by SM.	

A.5 CHAPTER 5 NETWORK CONTROL SERVICES PROCUREMENT

Clause	Obligation	Procedure
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Clause	Obligation	Procedure
5.5	Contract Conditions	
5.5.2	SM must work with the IMO where the IMO seeks to consult with it in developing or amending standard contractual terms relating to Network Control Service Contracts.	
5.5.4	SM must work with the IMO where the IMO seeks to consult with it before entering into a Network Control Service Contract which varies substantially from the terms of the standard form.	
5.7	Network Control Service Dispatch	
5.7.2	System Management may call upon the relevant Facility to provide services under a Network Control Services Contract in accordance with the terms of the contract.	
5.7.4	System Management must document the procedure it will follow in calling on Registered Facilities to provide services under Network Control Service Contracts in the Power System Operation Procedure, and System Management must follow that documented Market Procedure when calling on Registered Facilities to provide services under Network Control Service Contracts.	

A.6 CHAPTER 6 THE ENERGY MARKET

Clause	Obligation	Procedure
6.13	Real Time Dispatch Information	
6.13.1	SM must provide the IMO with dispatch data for settlement purposes.	
6.14	Calculation of MCAP, UDAP and DDAP	
6.14.4	SM must provide the IMO with the Operational System Load Estimate for a Trading Interval so that it may use this as part of calculating the Marginal Cost Administered Price, Upwards Deviation Administered Price and Downwards Deviation Administered Price for the purposes of the STEM.	

Clause	Obligation	Procedure
6.19	Market Advisories and Energy Price Limits	
6.19.7	SM must comply with directions issued by the IMO as part of any Market Advisory.	
6.19.9	SM must advise the IMO if they become aware of any circumstances that might reasonably be expected to result in the IMO issuing a Market Advisory.	
6.19.10	System Management must follow documented Market Procedure after the IMO has issued a relevant Market Advisory	

A.7 CHAPTER 7 DISPATCH

Clause	Obligations	Procedure
7.1	Data Used in the Dispatch Process	
7.1.1	SM must maintain specific data in order to determine which Dispatch Instructions it will give.	398290 Maintain Loss Factor information
7.1.2	SM must continually modify its records of the data required under clause 7.1.1 to reflect any changes it becomes aware of.	
7.2	Load Forecasts and Ancillary Service Requirements	
7.2.1	SM must prepare Load Forecasts.	PSOP: Dispatch, section 4.1, 5.1 3957525: Preparing and updating load forecasts 3952147: Preparing list of Ancillary Service daily requirements (7.23A)
7.2.3	SM must update the Load Forecast for a Trading Day to be used in the dispatch process, as applicable.	PSOP: Dispatch, section 7.1
7.2.3A	SM must determine an estimate of Loss Factor and a list of Facilities for each Market Participant which is a provider of Ancillary Services.	PSOP: Dispatch, section 4.5.1

Clause	Obligations	Procedure
7.2.3B	System Management must provide: (a) the information determined in clauses 7.2.1(a) to the IMO by 7:30 AM on the Scheduling Day and (b) the information determined in clauses 7.2.3A to the IMO by 8:30 AM on the Scheduling Day.	PSOP: Dispatch, section 4.1.9, 4.5.5
7.2.4	SM must determine the actual quantity of Ancillary Services required by location for each Trading Interval of the Trading Day.	
7.2.6	SM must only use forecasts provided by Market Generators for each of its Intermittent Generators under clause 7.5.5 to set and revise requirements for Ancillary Service and to update its dispatch plans during the Trading Day.	PSOP: Dispatch, section 4.3.4
7.3	Outages	
7.3.1	SM must take account of Planned Outages in determining Dispatch Instructions.	
7.3.2	SM must take account of a Forced Outage or Consequential Outage (from the time it is notified of such outage) in determining Dispatch Instructions.	
7.3.4	SM must provide the IMO with a schedule of Planned Outages, Forced Outages and Consequential Outages for each Registered Facility it is aware of.	PSOP: Dispatch, section 4.6.1
7.4	Resources Plans	
7.4.2	SM must confirm receipt of a Resource Plan provided by the IMO within five minutes of receiving the plan.	PSOP: Dispatch, section 4.7.2 3803962: Confirming receipt of Resource Plans
7.4.4	SM may request a Market Participant confirm that it is able to conform to its Resource Plan for the relevant Trading Intervals.	PSOP: Dispatch, section 4.7.5
7.5	Dispatch Merit Orders and Fuel Declarations	

Clause	Obligations	Procedure
7.5.2	SM must confirm receipt of Dispatch Merit Orders and Fuel Declarations provided by the IMO within five minutes of receiving the orders/declarations.	PSOP: Dispatch, section 4.8.2 3803981: Confirming receipt of DMO and Fuel Declarations.
7.5.6	SM must retain a record of all notifications from a Market Participant (other than the Electricity Generation Corporation) in respect of a change of fuel for a Scheduled Generator.	PSOP: Dispatch, section 7.2.9
7.5.7	SM must, for the purposes of employing Dispatch Merit Orders, assume that a Facility is operating on the fuel indicated for that Facility in the applicable Fuel Declaration.	
7.6	The Dispatch Criteria	
7.6.1	SM must seek to meet certain criteria in relation to scheduling and dispatching the Registered Facilities of the Electricity Generation Corporation and issuing Dispatch Instructions to other Market Participants.	PSOP: Dispatch, section 6.2.1
7.6.2	SM must schedule and dispatch the Registered Facilities of the Electricity Generation Corporation and Registered Facilities covered by any Balancing Support Contract or Ancillary Service Contract such to implement Resource Plans it has received from the IMO for Market Participants other than the Electricity Generation Corporation.	PSOP: Dispatch, section 8.3.1
7.6.2A	SM must employ reasonable endeavours to minimise, and/or take certain factors into account where the Dispatch Criteria requires it to alter the Dispatch Plan of the Electricity Generation Corporation.	
7.6.3	SM may issue Dispatch Instructions to Market Participants other than the Electricity Generation Corporation where meeting the requirements under clause 7.6.1 would otherwise require System Management to use Liquid Fuelled Facilities of the Electricity Generation Corporation.	
7.6.4	SM must issue Dispatch Instructions to Market Participants other than the Electricity Generation Corporation where the use of Registered Facilities of the Electricity Generation Corporation would not allow it to implement Resource Plans for Market Participants in accordance with the criteria in clause 7.6.1.	PSOP: Dispatch, section 8.4.1.b

Clause	Obligations	Procedure
7.6.5	SM must cancel any Dispatch Instruction issued in accordance with clauses 7.6.3 and 7.6.4 where the circumstances underlying the dispatch of the instructions have changed.	PSOP: Dispatch, section 9.5.1
7.6.5A	SM must ensure it does not issue a Dispatch Instruction solely because a Market Participant has notified it of a change in fuel in accordance with clause 7.5.4.	
7.6.6	SM may issue Dispatch Instructions to Market Participants other than the Electricity Generation Corporation.	PSOP: Dispatch, section 8.2.1
7.6.7	SM may enter into Balancing Support Contracts with Market Participants other than the Electricity Generation Corporation to assist it in meeting its obligations under chapter 7.	
7.6.8	Where System Management has entered into a Balancing Support Contract, System Management must report the capacity contracted and the terms for calling on the capacity to the IMO.	
7.6.9	Where System Management has entered into a Balancing Support Contract, System Management must report the capacity contracted and the terms for calling on the capacity to the IMO.	
7.6.10	SM may issue directions to the Curtailable Load in accordance with the Reserve Capacity Mechanism.	
7.6.11	SM may call upon the relevant resource to provide service under any Supplementary Capacity Contract in accordance with the terms of the contract.	
7.6.12	SM may give a direction to a Market Participant (other than the Electricity Generation Corporation) in respect of a Scheduled Generator or Non-Scheduled Generator registered by the Market Participant in relation to the reactive power output of the Facility.	PSOP: Dispatch, section 9.10 NOTE: does not mention non-EGC

Clause	Obligations	Procedure
7.6.13	SM must document the procedure it follows when scheduling or dispatching Registered Facilities covered by any Balancing Support Contract or Ancillary Service Contract in the Power System Operation Procedure and ensure such procedure is followed by it.	
7.6A	Scheduling and Dispatch of the Electricity Generation Corporation	
7.6A.2(b)	SM must provide the Electricity Generation Corporation with a forecast of total system demand for the Trading Day.	PSOP: EGC Dispatch, section 6.1
7.6A.2(c)	SM must provide the Electricity Generation Corporation certain other information by 12.30 pm on the Scheduling Day associated with a Trading Day.	PSOP: EGC Dispatch, section 6.2
7.6A.2(e)	SM must either confirm the Dispatch Plan under sub-clause 7.6A.2(c) or notify the Electricity Generation Corporation of changes to the plan (including forecast fuel requirements reflecting any changes required to accommodate Resource Plans or changes in conditions).	PSOP: EGC Dispatch, section 6.3
7.6A.2(f)	SM must change a Dispatch Plan where it becomes aware of a change of conditions which materially impact the Dispatch Plan.	PSOP: EGC Dispatch, section 6.3.1
7.6A.3	SM conduct in respect of <u>dispatch</u> of Electricity Generation Corporation Facilities during a Trading Day.	PSOP: EGC Dispatch, section 7
7.6A.4	SM conduct in respect to the dispatch <u>compliance</u> of the Electricity Generation Corporation.	PSOP: EGC Dispatch, section 8
7.6A.5	SM responsibility in respect of administration and reporting of dispatch.	PSOP: EGC Dispatch, section 9
7.6A.6	SM must retain all records, including minutes of meeting, created as a result of clause 7.6A.	PSOP: EGC Dispatch, section 9.2.5
7.6A.7	SM must document the procedures it and the Electricity Generation Corporation must follow in relation to clause 7.6A in the Power System Operation Procedure and ensure it follows such procedure.	PSOP: EGC Dispatch

Clause	Obligations	Procedure
7.6A.8.	Commercially sensitive information of the Electricity Generation Corporation must not be included in the Power System Operation Procedure.	PSOP: EGC Dispatch, section 10
7.6A.9	System Management must obtain the approval of the IMO prior to the confidential procedure described in clause 7.6A.8, or any amendments to that private procedure, being enacted.	
7.7	Dispatch Instructions	
7.7.1	SM may issue a Dispatch Instruction to a Market Participant (other than the Electricity Generation Corporation) directing the Market Participant to vary the output or consumption of one of its Registered Facilities.	PSOP: Dispatch, section 9.1.1
7.7.4	SM must determine which Facilities will be affected by Dispatch Instructions (by applying the relevant Dispatch Merit Order required).	PSOP: Dispatch, section 9.1.2
7.7.4A	SM must select Curtailable Loads from the Dispatch Merit Order in accordance with the Power System Operations Procedure.	
7.7.5	A Dispatch Instruction for a Trading Interval must not be issued earlier than 2:00 PM on the Scheduling Day for the Trading Day on which the Trading Interval falls or later than the end of the Trading Interval.	PSOP: Dispatch, section 9.3.1
7.7.5A	SM must calculate the quantity (for that part of the Dispatch Instruction Payment detailed under clause 6.17.6(c)(i)) of a Non-Scheduled Generator for each Trading Interval.	PSOP: Dispatch, section 10.4.3
7.7.5C	The Power System Operation Procedure must specify that actual wind data for the site of a wind farm and the number of turbines operating, if made available by a Market Participant to System Management, are sufficient to allow System Management to determine what the output of a wind farm would have been had no Dispatch Instruction been issued.	PSOP: Dispatch, section 10.4.1.2
7.7.5D	SM must determine the quantity for a Curtailable Load for each Trading Interval (for the purposes of clause 6.17.6(d)(i)) as equivalent to the curtailment requested by System Management in its Dispatch Instructions.	

Clause	Obligations	Procedure
7.7.6	SM must issue a Dispatch Instruction by telephone to the relevant Market Participant.	PSOP: Dispatch, section 9.7.1
7.7.8	SM must record all Dispatch Instructions.	PSOP: Dispatch, section 9.7.6
7.7.9	SM must document the procedure it and Market Participants are required to follow in respect of forming, issuing, recording, receiving and confirming Dispatch Instructions (and determining the quantities described in clauses 7.7.5A and 7.7.5D) in the Power System Operation Procedure.	
7.8	Dispatch Instructions Implemented by SM	
7.8.1	SM may, by agreement with a Market Participant, maintain operational control over aspects of a Registered Facility.	PSOP: Dispatch, section 13.2
7.8.2	The maintenance of operational control of a Registered Facility by System Management does not remove the obligation on System Management to produce Dispatch Instructions for those Registered Facilities.	PSOP: Dispatch, section 13.3
7.9	Commitment	
7.9.3	SM may request a Market Participant who has provided confirmation of synchronisation of a Scheduled Generator to provide further notification to it immediately before such synchronisation.	PSOP: Dispatch, section 12.1.3
7.9.4	SM must grant a Market Participant permission to synchronise (subject to certain conditions).	PSOP: Dispatch, section 12.1.5
7.9.7	SM may request a Market Participant who has provided confirmation of desynchronisation of a Scheduled Generator to provide further notification to it immediately before such synchronisation.	PSOP: Dispatch, section 12.2.4
7.9.8	SM must grant a Market Participant permission to desynchronise (subject to certain conditions).	PSOP: Dispatch, section 12.2.7
7.9.12	SM must record any desynchronisation of a Facility undertaken by a Market Participant (notwithstanding that System Management refused permission for this) as a Forced Outage.	PSOP: Dispatch, section 12.2.11

Clause	Obligations	Procedure
7.10	Dispatch Compliance	
7.10.4	SM must monitor the behaviour of Market Participants with Registered Facilities to assess whether they are complying with clause 7.10.1 in accordance with its Monitoring and Reporting Protocol.	PSOP: Dispatch, section 11.1.4, PSOP: EGC Dispatch section 8.1 3754202: How to monitor compliance with Resource Plans 3841520: Issue a warning for dispatch deviation
7.10.5	System Management must warn the Market Participant about the deviation and request an explanation for the deviation; and cessation of the behaviour within a time that System Management considers reasonable.	PSOP: Dispatch, section 11.1.5, PSOP: EGC Dispatch section 8.2
7.10.7	SM may take certain action where a Market Participant does not comply with a request issued by it under clause 7.10.5.	PSOP: Dispatch, section 11.1.8-9, PSOP: EGC Dispatch section 9.2.1
7.11	Advisories, Balancing Suspension and Reporting	
7.11.2	SM may issue a Dispatch Advisory for future potential events if it considers that there is a high probability that the event will occur within 48 hours of the time of issue.	PSOP: Dispatch, section 14.1.3 3754204: How to issue and cancel Dispatch Advisories
7.11.3	SM must issue a Dispatch Advisory as soon as practicable after it becomes aware of the situation requiring release of the advisory.	PSOP: Dispatch, section 14.1.5
7.11.4	SM must inform Market Participants, Network Operators and the IMO of the withdrawal of a Dispatch Advisory as soon as practical once the situation that the Dispatch Advisory relates to has finished.	PSOP: Dispatch, section 14.1.7
7.11.5	SM must release a Dispatch Advisory in the event, or in anticipation of, certain situations.	PSOP: Dispatch, section 14.2
7.11.6A	SM may issue directions as if a Dispatch Advisory had been issued in the event of a High Risk Operating State or an Emergency Operating State provided that it informs the relevant Market Participant or Network Operator of the applicable operating state as soon as practical.	PSOP: Dispatch, section 14.3.3

Clause	Obligations	Procedure
7.12	Status Reports	
7.12.1	SM must provide a report to the IMO every three months on the performance of the market in relation to the dispatch regime.	PSOP: Monitoring and Reporting, section 9.1 3867902: How to create the 7.12 Status Report
7.13	Settlement and Monitoring Data	
7.13.1	SM must provide specific data to the IMO for a Trading Day.	PSOP: Data Cleansing, section 1
7.13.2	SM must maintain systems capable of providing the data described in clause 10.5.1(y) to the Market Web Site as soon as practicable following the completion of a Trading Interval.	

A.8 CHAPTER 9 SETTLEMENT

Clause	Obligation	Procedure
9.1	Introduction	
9.1.2(c)	A Rule Participant makes a taxable supply to another Rule Participant or person under these Market Rules, the other Rule Participant or person must also pay the first Rule Participant making the supply an additional amount equal to the GST payable in respect of that supply	
9.1.2(e)	Rule Participants must, if requested by the IMO, do everything necessary (including the entering into of recipient created tax invoice agreements) to enable the IMO to issue valid tax invoices, recipient created tax invoices and adjustment notes in respect of all taxable supplies made by or to the IMO under these Market Rules	
9.20	Notices of Disagreement	
9.20.3	If a Rule Participant fails to receive a confirmation in accordance with clause 9.20.2, then it must contact the IMO within one Business Day of the deadline for	

Clause	Obligation	Procedure
	receipt of the confirmation described in clause 9.20.2 to appraise the IMO of the failure of the IMO to confirm receipt and, if necessary, to make alternative arrangements for the submission of the Notice of Disagreement.	
9.20.5(c)	SM must investigate and provide a response to the IMO where the IMO requests it to do so after receiving a Notice of Disagreement from a Rule Participant in respect of a Settlement Statement.	
9.22	Invoicing and payment	
9.22.5	Unless otherwise authorised by the IMO, all Rule Participants must use the EFT facility nominated by the IMO under clause 9.22.4 for the purpose of settlements under these Market Rules and the payment of Market Participant Fees to the IMO to the extent nominated by the IMO.	
9.22.6	If an Invoice indicates that a Rule Participant owes an amount to the IMO, then the Rule Participant must pay the full amount to the IMO (in cleared funds) by 10 AM on the date specified in the Invoice in accordance with clause 9.16.1(b), 9.16.2(e), and 9.16.4(d) (as applicable), whether or not it disputes the amount indicated to be payable.	
9.23.3	If a Rule Participant becomes aware that a suspension event has occurred in relation to it, then the Rule Participant must promptly notify the IMO, giving full details of the event.	

A.9 CHAPTER 10 INFORMATION POLICY

Clause	Obligation	Procedure
10.3	The Market Web Site	
10.1.2	Rule participants to retain data in accordance IMO list	
10.2.4	A Rule Participant must not provide information or documents of a given	

Clause	Obligation	Procedure
	confidentiality status to any person	
10.2.6	A Rule Participant may disclose information or a document	
10.3.3	SM may agree to the IMO delegating authority to it to directly post information or documents on the Market Web Site which it is required to provide the IMO under the Market Rules.	N/A
10.3.5	SM must comply with any protocol documented in a Market Procedure by the IMO in respect of the IMO or System Management changing the Market Web Site.	